

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**TINA SOHN**

**Plaintiff,**

**v.**

**MORGAN STANLEY DW, INC., CARL  
CHAPUT AND BEN FIRESTEIN.  
Defendants.**

**Civil Action No.  
04-12348 MLW**

**DEFENDANTS' MOTION TO EXTEND TIME TO FILE  
A RESPONSIVE PLEADING**

Defendants, Morgan Stanley DW, Inc., Carl Chaput, and Ben Firestein (“Defendants”) respectfully request that this Court extend the time for filing a responsive pleading in the above-referenced matter until November 29, 2004, to allow the parties to continue discussing the possibility of an early resolution and/or mediation in this matter. The parties have been discussing the possibility of attempting to resolve this matter, including mediation, prior to engaging in protracted litigation. In order to conserve resources and to provide the parties time to determine whether this matter may be resolved through some means other than litigation, Defendants request the time for filing a responsive pleading in this matter be extended.

Counsel for Defendants has made diligent efforts to attempt to confer with Plaintiff’s counsel regarding this Motion, however, Plaintiff’s counsel has not been available.

WHEREFORE, for the foregoing reasons, Defendants respectfully submit that

good cause exists and asks the Court to grant their Motion to Extend Time to File a Responsive Pleading to and including November 29, 2004.

Respectfully Submitted,

MORGAN STANLEY DW, INC., CARL  
CHAPUT AND BEN FIRESTEIN

By their Attorneys,

/s/ Corinne L. Hood

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Date: November 10, 2004

**Certificate of Service**

I hereby certify that a copy of the foregoing Defendant Morgan Stanley DW Inc.'s Assented to Motion to Extend Time to File a Responsive Pleading was served upon Jeffrey C. Mc.Lucas, Esq., McLucas & West. P.C., 141 Tremont Street, Boston, MA 02111 by electronic filing this 10<sup>th</sup> day of November 2004.

/s/ Corinne Hood

Corinne Hood